

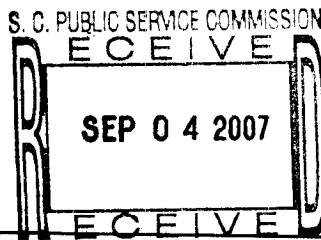
STATE OF SOUTH CAROLINA

(Caption of Case)

**Application of South Carolina Electric & Gas
Company for Adjustments and Increases in Electric
Rate Schedules and Tariffs**

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

COVER SHEET



DOCKET

NUMBER: 2007 - 229 - E

(Please type or print)

Submitted by: Audrey Van Dyke
Naval Facilities Engineering
Address: Command,
Litigation Office,
720 Kennon Street, SE, Room 136, Bldg 36

SC Bar Number: _____

Telephone: 202 685-1931

Fax: 202 433-2591

Washington Navy Yard, DC 20374-5051

Other: _____

Email: audrey.vandyke@navy.mil

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition** ☐ **Request for item to be placed on Commission's Agenda expeditiously**

☒ **Other:** Intervenor Discovery Request

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	

188074



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
LITIGATION OFFICE
720 KENNON STREET SE ROOM 136
WASHINGTON NAVY YARD DC 20374-5051

IN REPLY REFER TO

August 30, 2007

Mr. Charles Terreni
Chief Clerk and Administrator
Public Service Commission of SC
Post Office Drawer 11649
Columbia, SC 29211

Re: Application of South Carolina Electric & Gas Company
For Adjustments and Increases in its Electric Rate Schedules and Tariffs
DOCKET NO. 2007-229-E

Dear Mr. Terreni:

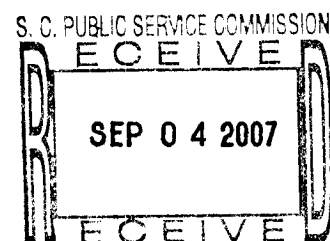
Enclosed please find the original and ten copies of the first Data Request filed by the Department of the Navy in the above-referenced Docket Number.

Sincerely,

A handwritten signature in cursive script, likely of Audrey Van Dyke, is written over the typed name.

AUDREY VAN DYKE
For the Secretary of the Navy
And all Federal Executive Agencies
(202) 685-1931
fax (202) 433-2591

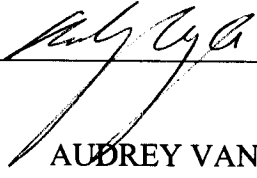
cc:
service list



CERTIFICATE OF SERVICE

I certify that on this date I caused to be served by electronic filing copies of the Department of the Navy's Petition to Intervene to the Service List in this proceeding. The email service noted that hard copies will be provided upon request.

This the 30th day of August, 2007.



AUDREY VAN DYKE
For the Secretary of the Navy
(202) 685-1931
fax (202) 433-2591

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**South Carolina Electric & Gas Company
Docket No. 2007-229-E**

**First Data Request of U.S. Department of Navy to
South Carolina Electric & Gas Company**

<u>Item No.</u>	<u>Description</u>
FEA 1-1.	Please provide all responses in electronic format, for this and other parties data responses, unless otherwise specified, and also provide a working model of the cost of service study in electronic format, including input, output and logic.
FEA 1-2.	<p>Please provide the entire jurisdictional and class cost of service studies at per book, present and proposed rate levels used by South Carolina Electric & Gas (SCE&G or Company) in this proceeding. Please include the following:</p> <ul style="list-style-type: none"> a. A hard copy of all workpapers associated with the cost of service study; b. The development and source data of all allocation factors used in the cost of service study; c. An explanation of all items that are directly assigned to classes; d. The development and calculation of all taxes for total company, total retail and each rate class; e. A description of the allocation methodology used; and f. Is the allocation methodology used by the Company in this filing the same as the allocation methodology used in previous filings? If the answer is no, explain all changes and reasons for all changes.
FEA 1-3.	<p>Please provide workpapers that develop the distribution of the requested revenue increase by rate class. In that regard, include the following:</p> <ul style="list-style-type: none"> a. Present revenues by rate class; b. The distribution of the increase by rate class; c. Proposed revenues and resulting class rates of return by rate class; d. The logic or explanation for the distribution of the increase by rate class; and e. Workpapers that show the change in the base fuel rate and the impact on revenues associated with each class from the change in base fuel rate.

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**South Carolina Electric & Gas Company
Docket No. 2007-229-E**

**First Data Request of U.S. Department of Navy to
South Carolina Electric & Gas Company**

<u>Item No.</u>	<u>Description</u>
FEA 1-4.	Please provide MWh sales by voltage level for each rate class stated at the customer meter and at the generation source showing the adjustment for losses.
FEA 1-5.	With respect to the development of the coincident peak demand allocator, please provide the following: <ul style="list-style-type: none"> a. The derivation of the allocator showing the entire four-hour peak period; b. The definition of jurisdictional peak day and show what is eliminated from the total system peak day; c. Compare the coincident peak demand and resulting allocation factor as utilized in this cost of service study with previous years and previous cost of service studies; d. Has the coincident peak factor been normalized in any manner? If the answer is yes, please provide all normalizing adjustments; and e. If the coincident peak factor has not been normalized, please provide documentation that shows the coincident peak utilized by the Company is a normal system peak. f. In connection with the class cost of service study, please provide all unit cost studies that show the cost of energy, demand and customer components for each class under present and Company proposed rate levels. g. Please provide all rate design workpapers that show the derivation of proposed rates, billing units, present rates, present revenues, revenue increase and proposed rates. Show how the rate design and rate revenue equates to the revenue amounts in the class cost of service study. h. Please provide all workpapers supporting Paragraph 12 of the Application requesting the changes and increases to rates, charges and tariffs. i. Please provide all responses to data requests and all other data and information supplied to all other parties in this proceeding. j. For the test year, please provide the monthly coincident peak demands at the generation level by rate class as used in the test year cost of service study.

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**South Carolina Electric & Gas Company
Docket No. 2007-229-E**

**First Data Request of U.S. Department of Navy to
South Carolina Electric & Gas Company**

- | <u>Item No.</u> | <u>Description</u> |
|-----------------|---|
| k. | For the test year, please provide sales at the customer meter and at the generation level for each rate class as used in the test year cost of service study. |
| l. | Please provide the monthly coincident peak demands for 2007 in similar format to the information provided in the FERC Form 1, page 401, "Monthly Peaks and Output." |
| m. | Please provide a forecast of the SCE&G monthly peak demands and annual system peak demands for the next ten years. |
| n. | Please describe SCE&G's planning peak for purposes of calculating reserve margin and for generation capacity requirements. |
| o. | For how many years and how many cases filed before the South Carolina PSC has the Company proposed the summer coincident peak method of cost allocation? Please explain. Also, indicate how many years the South Carolina PSC has approved the summer coincident peak method of allocation for SCE&G. |
| FEA 1-6. | Please provide in Word and Excel format with all formulas intact, all responses to the South Carolina Office of Regulatory Staff First Audit Request for Records and Information first data request and Staff follow-up questions or Docket No. 2007-229-E. |
| FEA 1-7. | Please provide a schedule that shows 2002-2006 FERC accounts and 2007 projected year ending amounts in each company FERC account and sub-account utilizing the following format: |

	2002	2003	Amount Change	% Change	2003	2004	Amount Change	% Change
Account xxx								
Subaccount xxx								

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**South Carolina Electric & Gas Company
Docket No. 2007-229-E**

**First Data Request of U.S. Department of Navy to
South Carolina Electric & Gas Company**

<u>Item No.</u>	<u>Description</u>
FEA 1-8.	Please explain any variance greater than \$1,000,000 or 10%, whichever is greater.